

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ROSLYN LA LIBERTE,

Plaintiff,

-against-

JOY REID,

Defendant.

Case No. 18-cv-05398 (DLI) (VMS)
E-Filed

NOTICE OF MOTION AND SUPPORTING AFFIDAVITS

PLEASE TAKE NOTICE, that upon the Declaration of John H. Reichman, dated November 6, 2019, Declaration of Daniel M. Kummer, sworn to November 4, 2019, and the exhibits annexed thereto, as well as the the accompanying Memorandum of Law, defendant Joy Reid, by and through her undersigned attorneys, will move this Court, before the Hon. Dora L. Irizarry, at the United States District Court, 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be designated by this Court, for an Order awarding Defendant's fees and costs in the amount of \$164,009.78, plus any additional fees and expenses incurred with respect to the this motion and action, pursuant to California's Anti-SLAPP Statute, CA CIV, §425.16, and the Court's September 30, 2019 Memorandum and Order.

Dated: New York, New York
November 6, 2019

Respectfully submitted,

WACHTEL MISSRY, LLP

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